

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW HAMPSHIRE**

UNITED STATES OF AMERICA

v.

TOSATTI PADMORE,

Defendant.

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Criminal Case No. 12-cr-61-01-PB

INDICTMENT

The Grand Jury charges:

COUNT ONE

21 U.S.C. § 841(a)(1)

Distribution of Oxycodone

On or about July 19, 2011, in the District of New Hampshire, the defendant,

TOSATTI PADMORE,

did knowingly and intentionally distribute oxycodone, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

COUNT TWO
21 U.S.C. § 841(a)(1)
Distribution of Oxycodone

On or about August 2, 2011, in the District of New Hampshire, the defendant,

TOSATTI PADMORE,

did knowingly and intentionally distribute oxycodone, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

COUNT THREE
21 U.S.C. § 841(a)(1)
Distribution of Oxycodone

On or about January 4, 2012, in the District of New Hampshire, the defendant,

TOSATTI PADMORE,

did knowingly and intentionally distribute oxycodone, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

COUNT FOUR
21 U.S.C. § 841(a)(1)
Distribution of Oxycodone

On or about January 11, 2012, in the District of New Hampshire, the defendant,

TOSATTI PADMORE,

did knowingly and intentionally distribute oxycodone, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

COUNT FIVE
21 U.S.C. § 841(a)(1)
Distribution of Oxycodone

On or about January 30, 2012, in the District of New Hampshire, the defendant,

TOSATTI PADMORE,

did knowingly and intentionally distribute oxycodone, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

COUNT SIX

18 U.S.C. § 924(c)

Possession of a Firearm in Furtherance of a Drug Trafficking Offense

On or about February 2, 2012, in the District of New Hampshire, the defendant,

TOSATTI PADMORE,

did knowingly possess a firearm, that is a Magnum Research Corporation Micro Desert Eagle .380 semi automatic (Serial Number ME04656), in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, that is distribution of a controlled substance, oxycodone, contrary to Title 21, United States Code, 841(a)(1), in violation of Title 18, United States Code, Section 924(c)(1)(A).

COUNT SEVEN
18 U.S.C. §§ 922 and 924(a)(2)
Unlawful Possession of a Firearm

On or about February 2, 2012, in the District of New Hampshire, the defendant,

TOSATTI PADMORE

having been convicted of a crime punishable by imprisonment for a term exceeding one year –

i.e., Assault by Prisoners, in violation of New Hampshire Revised Statutes Annotated 642:9 on or

about June 28, 2007, also in Hillsborough County Superior Court (North) case no. 06-S-1046 –

did knowingly possess, in and affecting commerce, a firearm – i.e., a Magnum Research

Corporation Micro Desert Eagle .380 semi automatic (Serial Number ME04656) – which had

been shipped and transported in interstate commerce, in violation of Title 18, United States

Code, Sections 922(g) and 924(a)(2).

Dated: May 16, 2012

A TRUE BILL

/s/ Foreperson
Foreperson

JOHN P. KACAVAS
United States Attorney

By: /s/ William E. Morse
William E. Morse
Assistant United States Attorney
District of New Hampshire